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★ MAY 07 2019 ★

CHRISTOPHER MAY-SHAW

REG. NO. 11506-C40

FCI MILAN PO BOX 1000

MAY 2, 2019

BROOKLYN OFFICE

MILAN, MI 48160

VIA First Class Mail

Honorable Lois Bicemi

United States Magistrate Judge

U.S. District Court Eastern Dist. of New York

225 Cadman Plaza EAST

Brooklyn, NY 11201

re: Christopher May-Shaw v. City of New York, et al

17-cv-5591

Your Honor,

Please find enclosed a copy of the discovery issues that were not completely answered by Ms. Miller to my document requests. I also mailed Ms. Miller a letter regarding the redacted portions of the CIC complaints against Defendant officers as well as the documents that her supervisor was looking over, but I have yet to receive. I do not have a copy of that letter and wanted you to be aware of it. It is difficult to obtain copies from the Special Housing Unit (SHU).

Also, I wanted to ask you whether I can still receive pro bono counsel to assist me with the issue with the property and due process. I would still like the help from an attorney who is familiar with civil cases. So I respectfully ask you to look into pro bono counsel to assist me with the nearing critical stages, such as Summary Judgment. I am still confused and unaware of these things.

In advance, I thank you for your time regarding this matter and I look forward to our next telephone conference.

Respectfully

ISI Christopher May-Shaw

Samantha Millar

Office of the Corporation Counsel
New York City Law Department
100 Church Street
New York, NY 10007

RE: Robert Hogan AKA Christopher May-Shaw v. City of New York et al. 17-CV-5591
Document Request and Other Responses

Dear Ms. Millar,

Per our last telephone conference, I was advised to seek proper document requests or other responses that were not clear to me or objected to. A few document requests that I would like to point out and gain clarification of such documents and whether they exist before the May 24, 2019 Conclusion of Discovery.

However, the Document Requests are as follows:

Document Request No. 2

I requested a "full and correct" copy of the Grand Jury proceeding in the Criminal Case/proceeding that I signed authorization to your office to unseal the case pursuant to 160.50.

Your objections further mentioned that these documents are more readily available through the Defense attorney. However, Plaintiff was only provided "pieces" of

the Grand Jury proceedings from the Defense attorney. (Not a full and complete copy) I also disclosed to you the portions of the Grand Jury proceedings. (See Plaintiff's Disclosures). Further, the § 160.50 authorization, authorizes you to gain access to the document requested.

Document Request No. 3

I requested any correspondence between the City of New York, its officers and/or agents/servants and the Western District of Michigan U.S. Marshal Service regarding the seizure of \$ 93,654.12, recorded, emails, letters etc, in the City's custody or control.

Again you objected and lead me to Bates Stamps Nos. D 00168-00175, which does not pertain all the documents. Plaintiff is seeking "ANY CORRESPONDANCE" Without limitation between The City of New York, officers or agents and the Western District of MI US Marshal Service regarding the seizure. This requests include e-mails (back and forth), any recorded logs (as in dates/times) both Agency's Correspondent regarding the seizure. All corresponding documents are relevant to the discovery of who initiated and mandated the holding and subsequent seizure that authorized the Due Process violation.

Document Request No. 4

Plaintiff concedes that Doc. Request 4 is the same

as Doc Req No 3. Nevertheless, it is relevant to discovery, and ascertaining WHO authorized the holding of the \$93,652¹ by the NYPD and Defendant City.

Document Request No. 5

Produce any document that relates to where the currency in the amount of \$ 6,737.00 is located at this time.

Here you referred back to an objection to interrogatory No.8. However, the record clearly reflects that the Warrant from the US Marshal's Service "did not" include the seizure of the \$ 6,737.00 (See Warrant that specifically has two different amounts and two different dates: June 15, 2016 \$93,654.12 and August 10, 2016 \$11,491 etc). Not with holding the corrected US Marshal document, which does not include the \$6,737.00, this currency has still mysteriously dissipated. Therefore, this too, is highly relevant to discovery.

Furthermore, I respectfully ask that you respond to the above listed Document Requests. However, the remaining document requests, (No's 6 through 12) should be produced, as these Document Requests are relevant to the issues regarding this lawsuit, and the practice and procedures of the New York City Police Department.

May 1, 2018

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